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From: Koch, Kristine
Sent: Tuesday, August 18, 2015 9:02 PM
To: Bob Wyatt (rjw@nwnatural.com); Jim McKenna (jim.mckenna@verdantllc.com)
Cc: Jennifer Woronets (jworonets@anchorqea.com)
Subject: Portland Harbor FS Section 4
Attachments: 2015-08-18 Portland Harbor FS Section 4.doc; 2015-08-18 Section 4 Tables.xlsx; 2015-08-18 Table 4.3-1_Comparative Analysis.docx; 2015-08-18 Table 4.3-2 Qualitative Comparative Analysis.docx; 2015-08-18 Appendix F_HST Evaluation.pdf; 2015-08-18 Appendix G_Cost.pdf; 2015-08-18 Appendix H_Residual Risk.pdf; 2015-08-18 Appendix I_Rolling Rivermile Curves.pdf; 2015-08-18 Appendix J_404 mitigation strategy.pdf; Figure 4.1-4 _Absolute Bathymetric Change.pdf; Figure 4.1-5a-h_Bathymetry Compare Maps.pdf; Figure 4.1-6_2007_2012 Fish Tissue Data.pdf

Jim and Bob – EPA’s draft modifications to the 2011 Draft FS submitted by the LWG regarding the detailed evaluation of the alternatives and comparative analysis is attached. The figures are attached and the rest are provided in the FTP link, below. This information has been combined into a new Section 4 and Appendices F, G, H, I and J for the draft Final FS. Per the agreed process between the LWG and EPA, the LWG has 15 days to identify significant issues and until October 10, 2015 to review and provide comments to EPA from the time they receive FS Section 4. Therefore, the LWG is to identify significant issues by September 2, 2015. Additionally, if you have any technical issues that you would like to discuss in this time frame, please contact me. Further, per the agreed process, any issues raised during the 30-day review period are to be resolved within the subsequent 14-day period.

Regards,

Kristine

Please use the following URL to view this package over a secure connection. After viewing this package, you may also download any associated attachments or compose a reply using your favorite web browser.

(<https://files.cdmsmith.com/guestaccess.aspx?OrgID=8113&language=en&arg06=2cb7677f-17bb-45fb-b337-e8f02b646f3d>)

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EPA is transmitting Section 4 of the Portland Harbor Draft Final Feasibility Study for review and comment to the Lower Willamette Group (LWG), the Oregon Department of Environmental Quality (ODEQ), six federally recognized tribal governments, other federal and state partners, and the Community Advisory Group (CAG). These parties are receiving these documents because they have been working with EPA under special agreements in developing the Remedial Investigation and Feasibility Study for the Portland Harbor Superfund Site.

Section 4 presents the detailed evaluation of 7 NCP criteria, 2 threshold criteria and 5 balancing criteria, and a comparative analysis of the alternatives.

EPA is working to address concerns that have been raised both regionally and nationally regarding how it addresses sediment sites. The EPA draft FS is responsive to many of the concerns in the following specific ways:

- Regional and Headquarters staff and management are working together to ensure the FS complies with CERCLA, the NCP, EPA policy and guidance. The Headquarters team has experience with sediment sites nationwide. Therefore, lessons learned at other sites including sediment sites, are used to inform decision-making at Portland Harbor.

- EPA is including an appropriate range of technologies to address contaminated sediment such as dredging, capping, enhanced monitored natural recovery, monitored natural recovery, ex-situ treatment, in-situ treatment and institutional controls.
- EPA has evaluated and is including natural recovery in all cleanup alternatives.
- EPA's evaluation of remedial alternatives is focused on risk reduction with achievable cleanup goals over the long term.
- When developing the alternatives, EPA will consider the environmental conditions of the river (erosional, transitional or depositional) the current and potential future uses (industrial, recreational, etc.) and will seek to limit the use restrictions. For example:
 - EPA will consider limiting the use of caps in locations where commercial and shipping activities occur.
 - EPA will also consider future navigation and maintenance dredging when determining the appropriate cleanup technology.
 - Appropriate beach material will be placed in sediment cleanup locations that serve as public access points for recreation or wildlife habitat.

Next Steps

Internal EPA meeting with the National Remedy Review Board (NRRB) and the Contaminated Sediment Technical Advisory Group (CSTAG) is scheduled for November 18 and 19 in Portland, Oregon. EPA policy requires a conceptual remedy to be presented to the NRRB and the CSTAG for internal review prior to issuing the Proposed Plan for sites where cleanup will cost more than \$50 million. The Portland Harbor cleanup will require this review. The NRRB and CSTAG review conceptual remedies to ensure national consistency with CERCLA, the NCP, and EPA policies and guidances. Both groups also take into consideration past practice at sites similar magnitude and provide advisory recommendations for the concept remedy. The EPA Portland Harbor team will use the advisory recommendations from the NRRB and CSTAG in developing the Proposed Plan. The LWG, ODEQ, six federally recognized tribal governments, and CAG can provide input to the NRRB and CSTAG on the concept remedy. To facilitate their ability to provide input, EPA will share the concept remedy with these parties on September 18, 2015.

EPA expects to release a proposed cleanup plan for public review and comment in the spring of 2016. EPA has several internal steps to complete before releasing the Proposed Plan.

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